AO 91 (Rev. 11/11) Criminal Complaint

	HNITED STAT	TES DISTRICT COURT	United States Courts	
		for the	Southern District of Texas FILED April 17, 2025	
		n District of Texas		
)		
V.)	Nathan Ochsner, Clerk of Cou	
) Case No. 4:25-mj	-0227	
Wadell Price)		
Defe	endant(s)	/		
	CRIMIN	VAL COMPLAINT		
I, the complainan	t in this case, state that the f	Collowing is true to the best of my know	wledge and belief.	
On or about the date(s) of	4/15/2025	in the county of	Harris in the	
Southern Distric	t ofTexas	_ , the defendant(s) violated:		
Code Section		Offense Description		
18 USC 922(g)(1)	Felon in Pos	session of a Firear		
18 USC 922(o) Possession		of a Machinegun		
This criminal con	nplaint is based on these fact	ts:		
See attached affidavit				
✓ Continued on t	the attached sheet.			
		Steries	Oroan.	
		Complair	nant's signature	
			k, Special Agent, FBI	
		Printed	name and title	
Sworn to by telephone.				
Date: April 17, 2025	5	Dena	Palermo	

Houston, Texas

City and state:

Hon. Dena Hanovice Palermo, U.S. Magistrate Judge

Printed name and title

Judge's signature

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Steven Dvornick, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI), Department of Justice, and have been so employed since July 2022. During my time in the FBI, I have participated in investigations of RICO, murder for hire, assaults on federal officers, Hobbs Act violations, violent crimes, drug trafficking, and violations of federal firearms laws, among other things. I have also conducted or participated in surveillances, the execution of search warrants, debriefings of informants and reviews of recorded conversations. Through my training, education, and experience, including conversations with other law enforcement officers, I have become familiar with the patterns of activity regarding aggravated robbery suspects and the methods they employ to plan, coordinate, and conduct these robberies. I have also become familiar with felon in possession cases and machinegun conversion devices (MCDs), which alter a firearm to allow it to function as a fully automatic weapon.
- 2. This Affidavit is made in support of a criminal complaint charging Wadell Price with Felon in Possession in violation of Title 18 U.S.C. § 922(g)(1) and Possession of a Machinegun in violation of Title 18 U.S.C. § 922(o). I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and my conversations with other law enforcement officers involved in this investigation.
- 3. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause that

violations of Title 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 922(o) have been committed by Wadell Price. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

PROBABLE CAUSE

- 4. The FBI Houston Violent Crimes Task Force (VCTF) is investigating robbery crews and Hobbs Act violations in Houston, Texas. The investigation led the VCTF to several individuals who conduct commercial robberies in Houston and in other locations throughout the United States. As a part of the investigation, several subjects were identified, one of which is an individual named Wadell Price (hereafter referred to as Price,) date of birth August 24, 2003. Price has been identified as a documented gang member of 300 Audrey Lane and Check Chasin Gang. Price was being investigated for concerns of possible violations of Felon in Possession in violation of Title 18 U.S.C. § 922(g)(1) and Possession of a Machinegun in violation of Title 18 U.S.C. § 922(o).
- 5. On April 7, 2025, Price posted a story on his known Instagram account with the username @lilchapobitch, which was reviewed by members of the VCTF. The video depicted several males sitting in a vehicle. During the video, all of the males hold up firearms and display them for the camera. One of the males in the video also shows the rear of the slide of their firearm, which displays what appears to be a machinegun conversion device.
- 6. On April 15, 2025, members of the VCTF were conducting surveillance on Price, in a heavily tinted black Audi SUV bearing a Texas paper license plate of 7426H19. A Texas Department of Public Safety (DPS) Trooper attempted to initiate a traffic stop by activating their emergency lights and siren for a probable cause traffic stop for a violation of window tint standards and an obstructed license plate. The black Audi SUV pulled into the driveway of 6901 Jay Street, Houston, TX 77028, which is located in the Southern District of Texas, when a male passenger

who was wearing a hoodie fled from the vehicle towards the residence. The Trooper saw the male drop two pistols over the chain-link fence as the male climbed over the fence. The male then continued towards the residence and entered the residence. The Trooper recognized that one of the firearms had a machine gun conversion device on the rear of the slide. DPS Troopers and members of the VCTF surrounded the house, secured the scene, and initiated a surround and call out of the residence. A female, Keshaun Hamilton, exited the residence and informed the VCTF that she was the mother of Wadell Price and confirmed that Price was the male who ran into the residence. Price initially refused to comply with commands given by DPS Troopers, but after approximately 20 minutes of refusing verbal commands. Price surrendered to DPS Troopers.

- 7. Both firearms were collected by members of the VCTF. One firearm was identified as a Glock 19, 9mm pistol bearing serial number SSY874 with a loaded extended magazine and a cartridge in the chamber. The Glock 19 also contained an MCD on the rear of the slide of the firearm. The second firearm was identified as a Glock 20, 10mm firearm bearing serial number BUSA486 with a loaded magazine and a cartridge in the chamber.
- 8. Following the arrest, Price was Mirandized and interviewed by members of the VCTF. Price confirmed that he ran from police because he was scared. Price admitted that he had the pistols while he was running away from the police and that he dropped them. Price further confirmed that he knew what a "switch" was, what it looks like and that it alters a firearm to fire fully automatically and "bursts." Bursts is common terminology for when the single press of a trigger results in the shooting of multiple bullets out of a firearm. A switch is a common slang term for a machine gun conversion device that is affixed to the rear of a Glock firearm.
- 9. According to Title 26 U.S.C. § 5845 a "machinegun" is defined as any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot,

without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

10. On April 15, 2025, Price was transported by DPS Troopers to the Harris County Joint Processing Center, where he was placed into Harris County custody under the charge of unlawful possession of firearm by a felon.

11. Price has a criminal record of convictions of evading arrest or detention with a vehicle and theft of property between \$500 to \$1500. Price is a convicted felon for a previous charge of evading arrest or detention with a vehicle in the 232nd District Court of Houston, with a disposition date of February 29, 2024. Price pled guilty to the charge and received a two-year sentence in a Texas Department of Criminal Justice facility. Price was paroled by the Pardon and Parole Board on September 5, 2024, and will be on parole until October 7, 2025.

CONCLUSION

12. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Wadell Price with Felon in Possession in violation of Title 18 U.S.C. § 922(g)(1) and Possession of a Machinegun in violation of Title 18 U.S.C. §

922(o).

Respectfully submitted,

Steven Dvornick Special Agent

Federal Bureau of Investigation

Subscribed and sworn to before me telephonically on April 17, 2025, and I find probable cause.

Honorable Dena Hanovice Palermo United States Magistrate Judge

Southern District of Texas